GMTA/DITTA Workshop on Reliance

- Scene Setting: What is reliance and why is it important?
- Session 1: Reliance in a premarket setting
- Session 2: Reliance in a post market setting
- Next Steps



ADMINISTRATION



Anvisa - Brazil Post Market Experience

Ana Carolina M. Marino Araujo Fourth Directorate Anvisa March 11, 2024



* Reliance Activities and Anvisa Strategic Priority Plan 2024-2029

Anvisa Strategic Priority Plan 2024-2029

Objective 5: To be recognized as an International Reference Regulatory Authority.

Consolidation of Anvisa leading role in the international scenario, ensuring high standards in all regulatory operations.



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IDRF 2024 Chair

Reliance Activities in Inspections

- Pathways for the grant of GMP Certificates issued by Anvisa
- GMP Inspection conducted by Anvisa inspectors with the issuance of an Inspection Report attesting if the company has a Quality Management System and complies with the Good Manufacturing Practices.
- 2. Based on the information from other Inspection Reports issued by recognized authorities accompanied by a Risk Analysis.
- 3. Based on MDSAP Inspection Reports and Certificates.

Reference Legislation: RDC 687/2022

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Reliance Activities in Inspections and Resources

CPROD – Coordination for Inspections and Law Enforcement for Medical Devices

Inspections/audits of companies

GMP Certification using risk analysis + reliance mechanisms and Anvisa Inspection Reports.

Investigation of complaints/quality defects and law enforcement actions



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***** GMP Certification in Numbers

YEAR	GMP Certificates Issued Based on MDSAP Reports by CAUPS (total and % of total)	GMP Certificates Issued Based on Anvisa Inspection + risk matrix by CPROD	Total International GMP Certificates issued
2017	38 (4.7%)	770 (95.3%)	808
2018	107 (19.3%)	447 (80.7%)	554
2019	374 (48.7%)	394 (52.3%)	768
2020	544 (49.1%)	564 (50.9%)	1108
2021	529 (51.4%)	500 (48.6%)	1029
2022	621 (59.7%)	419 (40.3%)	1040
2023	659 (59.1%)	456 (40.9%)	1115

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Other Post Market Activities

Resources allocated to other activities

- Increased number of Post Market Compliance (PMC) Inspections.
 - 85 inspections in the last 4 years * (*pandemic)
 - Previously approx. 4 inspections per year.
- Increased activities upon the receipt of MDSAP 5-day notice
 - 20 MDSAP 5-day notices all were assessed, and investigations were conducted:
 - 9 immediate enforcement actions, for example: prohibition of importation;
 - 11 technical complaints confirmed;
 - 01 penalty applied.



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Other Activities

Resources allocated to other activities

- Investigation of Complaints related to Quality Defects;
 - More than 1600 investigations in the last 4 years* (*pandemic)
- Launch of Monitoring Programs focused on specific products laboratory testing.
 - COVID19 diagnosis tests
 - Needles and Syringes
 - Infusion sets

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Monitoring Programs

COVID19 diagnosis tests (closed January 2023)

- 536 laboratory tests conducted
- 64.9% approved
- 35.1% not approved

Needles and Syringes (started August 2023)

- 21 lab tests conducted
- 100% approved

Infusion sets (started September 2023)

- 15 lab tests conducted
- 66.7 % approved
- 33.3 % not approved

data obtained on 29 February 2023

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Monitoring Programs



Monitoramento pós-mercado da qualidade de dispositivos para diagnóstico *in vitro* da COVID-19: análises laboratoriais





Data do Iaudo	Nome comercial	Fabricante	Lote	Laudo	Avaliação (quando o resultador for "não conforme", é identificado o responsável pela importação)	Responsável pela importação (produtos não conformes)	Resoluções (clique no link)			
17/08/202 0	COVID-19 lgG/lgM BIO	QUIBASA QUÍMICA BÁSICA LTDA.	0012	2354.1P.0/2020	Ações de fiscalização: Inutilização Suspensão - Comercialização, Distribuição - Quibasa Química Básica Ltda - 19.400.787/0001-07	Quibasa Química Básica Ltda	S			
17/08/202 0	COVID-19 lgG/lgM BIO	QUIBASA QUÍMICA BÁSICA LTDA.	0012	2354.1P.0/2020	Ações de fiscalização: Revogação de Medida Preventiva Ações de fiscalização revogadas: Interdição cautelar - Quibasa Química Básica Ltda - 19.400.787/0001-07	Quibasa Química Básica Ltda	ନ			
06/04/202 0	SARS-CoV-2 Antibody Test (Lateral Flow Method),	GUANGZHOU WONDFO BIOTECH CO. LTD	W19500335	1082.1P.1/2020	Conforme					
07/04/202 0	SARS-CoV-2 ANTIBODY TEST (LATERAL FLOW METHOD)	GUANGZHOU WONDFO BIOTECH CO. LTD	W19500329	1124.1P.0/2020	Conforme					
08/04/202 0	2019-nCOV IgG (CLIA)	SHENZHEN NEW INDUSTRIES BIOMEDICAL ENGINEERING	271200020 2	1084.1P.0/2020	Conforme					

Data da última atualização: 29/02/2024

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* Anvisa Silver Jubilee Celebration



The Agency celebrates 25 years of contributions to public health and to the quality of life of Brazilian citizens

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United States of America

2024